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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF COLUMBIA**
10 **(WASHINGTON, DC)**

11
12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 v.
15 KIM MICHAEL SORGENTE,
16 Defendant.

Case No. CR 21-669-TJK

**EX PARTE APPLICATION TO
MODIFY RELEASE CONDITIONS**

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18 Defendant Kim Michael Sorgente, through his counsel of record, Senior Litigator
19 Callie Glanton Steele, respectfully applies *ex parte* to the Court for an order modifying
20 his release conditions. Specifically, he is requesting that the court vacate the location
21 monitoring condition of his bond.

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DECLARATION OF CALLIE GLANTON STEELE

I, Callie Glanton Steele, declare:

1. I am the Senior Litigator with the Office of the Federal Public Defender for the Central District of California and our office has been appointed to represent Kim Michael Sorgente in this matter.

2. Mr. Sorgente was arrested on October 25, 2021, in the Central District of California. [Docket No. 3].

3. On October 26, 2021, he made his initial appearance in the Central District of California and was released pursuant to certain conditions.

4. On November 4, 2021, Mr. Sorgente appeared telephonically for a bail hearing in the District of Washington, D.C. His was to remain released on certain conditions. One of those conditions was that he participate in Global Positioning System (“GPS”) monitoring (“Location Monitoring”). [Docket No. 12 at 2-3 of 4].

5. On February 28, 2022, Mr. Sorgente had a hearing to review his release conditions and his conditions were modified slightly. [Text Only Order, dated February 28, 2022]. At that time, the Pretrial Services Agency was recommending that Mr. Sorgente’s location monitoring condition be vacated. I requested that the location monitoring condition be vacated, the government opposed, and the Court indicated that it would consider vacating the location monitoring condition when Mr. Sorgente secured stable housing.

6. Mr. Sorgente has secured stable housing. I have conferred with Mr. Sorgente’s pretrial services officer in the Central District of California, Officer Joey Trabucco, who indicate that Mr. Sorgente has stable housing. Mr. Trabucco indicated that he supports Mr. Sorgente’s request for the vacating of his location monitoring condition.

7. I conferred with Assistant United States Attorney Katherine Nielsen regarding this request. Ms. Nielsen indicated that the government continues to object to the vacating of the location monitoring condition.

